

Pacific Ag Management, Inc.  
P.O. Box 1200  
Wasco, CA 93280

July 30, 2011

The Honorable Julius Genachowski  
Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Str., SW  
Washington, DC 20554

RE: LightSquared Subsidiary LLC Request

Dear Mr. Chairman:

As an agricultural company dependent on precision agriculture techniques extensively in our operation, we are very concerned about the proposal made by LightSquared Subsidiary LLC as we feel it will be a significant and negative impact to our ability to continue to use this GPS technology. This concerns us because it will impact not only the economical viability of our operation, but it will also impact the environmental and social sensitivities we strive to employ to assure the sustainability of not only our operation, but that of agriculture. Agriculture in California provides 50% of the fruits, nuts and vegetables consumed in the United States. That means this action will impact the domestic food supply of our nation.

While we recognize that more capacity for wireless broadband services is important, it should not come at the expense of GPS, which, as stated above, is critical to our country's food security. In addition, based on the applications of GPS by aviation, construction, and government entities such as the National Telecommunications and Information Administration (NTIA), the Department of Defense, the Department of Transportation, and the Department of Homeland Security, this has broader implications beyond just agriculture – again, impacting national security.

We propose the following:

- The FCC must make clear, and the NTIA must ensure, that LightSquared's license modification is contingent on the outcome of the mandated study unequivocally demonstrating that there is no interference to GPS. The study must be comprehensive, objective, and based on correct assumptions about existing GPS uses rather than theoretical possibilities. Given the substantial pre-existing investment in GPS systems and infrastructure, and the critical nature of GPS

applications, the results of studies must conclusively demonstrate that there is no risk of interference. If there is conflicting evidence, doubts must be resolved against the LightSquared terrestrial system. The views of LightSquared, as an interested party, are entitled to no special weight in this process.

- The FCC should make clear that LightSquared and its investors are proceeding at their own risk in advance of the FCC's assessment of the working group's analysis. While this is the FCC's established policy, the Commission's International Bureau failed to make this explicit in its order.
- Resolution of interference has to be the obligation of LightSquared, not the extensive GPS user community of millions of citizens. LightSquared must bear the costs of preventing interference emanating from their devices, and if there is no way to prevent interference, it should not be permitted to operate. GPS users or providers should not have to bear any of the consequences of LightSquared's actions.
- This is a matter of critical national interest. There must be a reasonable opportunity for public comment of at least 45 days on the report produced by the working group and further FCC actions on the LightSquared modification order should take place with the approval of a majority of the commissioners, not at the bureau level.

Thank you for your attention to this matter. If you have any questions, please contact the undersigned at the numbers indicated.

Sincerely,

Geordy Wise, Farm Manager, Pacific Ag Management, Inc.

Holly A. King, Wasco Real Properties I, King and Gardiner Farms, Partner